

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

WILUS INSTITUTE OF STANDARDS
AND TECHNOLOGY INC.,

Plaintiff,

v.

HP INC., et al.,

Defendants.

Civil Action No. 2:24-cv-0752-JRG-RSP

LEAD CASE

JURY DEMANDED

**JOINT MOTION FOR EXTENSION OF TIME TO FILE PROPOSED PROTECTIVE
ORDER AND TO SERVE INITIAL AND ADDITIONAL DISCLOSURES**

Plaintiff, Wilus Institute of Standards and Technology, Inc. (“Wilus”) and Defendants HP Inc., Samsung Electronics Co. Ltd., Samsung Electronics America, Inc., Askey Computer Corp, and Askey International Corp. (collectively, “Defendants”) (collectively with Wilus, the “Parties”) file this Joint Motion for Extension of Time to File Proposed Protective Order and to Serve Initial and Additional Disclosures.

The current deadline for the Parties to file their proposed protective order and to comply with Paragraphs 1 & 3 of the Discovery Order (Initial and Additional Disclosures) is November 29, 2024. The Parties respectfully request a brief extension of time due to the holiday, Defendants’ retention of counsel, and the recent consolidation of the matter. The Parties have been diligently working to prepare these materials and respectfully request a brief extension of time in order to finalize these materials. This extension is not sought for prejudice or delay, but for good cause and so that justice may be served.

Accordingly, the Parties respectfully request that the Court extend the deadline for filing their proposed protective order and the deadline to comply with Paragraphs 1 & 3 of the Discovery Order (Initial and Additional Disclosures) by two weeks to December 13, 2024.

Dated: November 26, 2024

Respectfully submitted,

/s/ Reza Mirzaie

Reza Mirzaie

rmirzaie@raklaw.com

CA State Bar No. 246953

Marc A. Fenster

mfenster@raklaw.com

CA State Bar No. 181067

Neil A. Rubin

nrubin@raklaw.com

CA State Bar No. 250761

Christian W. Conkle

cconkle@raklaw.com

CA State Bar No. 306374

Jonathan Ma

jma@raklaw.com

CA State Bar No. 312773

RUSS AUGUST & KABAT

12424 Wilshire Boulevard, 12th Floor

Los Angeles, CA 90025

310-826-7474

**ATTORNEYS FOR PLAINTIFF,
WILUS INSTITUTE OF STANDARDS
AND TECHNOLOGY**

/s/ Lawrence Jarvis

Lawrence Jarvis

jarvis@fr.com

Fish & Richardson P.C.

1180 Peachtree Street NE, 21st Fl.

Atlanta, GA 30309

404-892-5005

Attorneys for HP, Inc.

/s/ Trey Yarbrough

Trey Yarbrough

trey@yw-lawfirm.com

YARBROUGH WILCOX, PLLC

100 E. Ferguson Street, Suite 1015

Tyler, TX 75702

903-595-3111

*Attorneys for Askey Computer Corp. and
Askey International Corp.*

/s/ Melissa Smith

Melissa Smith

Melissa@gillamsmithlaw.com

Gillam & Smith LLP

303 S. Washington Avenue

Marshall, TX 75670

903-934-8450

*Attorneys for Samsung Electronics Co. Ltd.
and Samsung Electronics America, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served this 26th day of November, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3). Any other counsel of record will be served by electronic mail on this same date.

/s/ Reza Mirzaie

CERTIFICATE OF CONFERENCE

The undersigned certifies that counsel complied with the requirements of Eastern District of Texas Local Rule CV-7(h). The parties are in agreement on filing this Joint Motion.

/s/ Reza Mirzaie